

LAW OFFICES OF  
**DANIEL W. ISAACS**  
A PROFESSIONAL LIMITED LIABILITY COMPANY  
122 CROSS RIVER ROAD  
MOUNT KISCO, NEW YORK 10549  
TEL: (646) 438-2100  
EMAIL: DANIEL.ISAACS@DANWISAACSESQ.COM

May 23, 2022

**VIA ECF**

The Honorable Katherine Polk Failla  
United States District Court  
Southern District of New York  
40 Foley Square Room 2103  
New York, New York 10007

Re: *J.C. v. Zimmerman*  
22-cv-323-KPF (S.D.N.Y.)

Dear Judge Polk Failla:

I represent the Plaintiff J.C. in this action. I write in response to the May 16, 2022, letter of Andrea Schillaci, Esq. requesting an order directing that we comply with outstanding discovery.

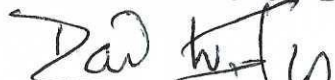
As an initial matter I apologize to the Court and Ms. Schillaci for not timely providing responses to Defendant's First Set of Interrogatories and First Request for Production of documents. Ms. Schillaci is correct that I had promised to provide responses but failed to do so.

My failure was not intentional but an amalgamation of several matters, including the filing of a complaint in this Court, preparing for two medical malpractice trials scheduled next month and, a trip to Ghana West Africa. I will note however that I did provide Ms. Schillaci with HIPPA authorizations for my client's records.

I represent to the Court and Ms. Schillaci that I shall serve Plaintiff's responses a week from today. My apologies again for any inconvenience to the Court and Defendant's counsel.

Respectfully submitted,

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